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## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

JUN 9 1988

## MEMORANDUM

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SUBJECT: Emissions from Rocket Firing at Test Stands; Fugitive

or Point Source Emissions

FROM: Ronald Shafer, Chief

Policy and Guidance Section

TO: John Dale

Air Programs Branch, Region VIII

This is in response to your May 9, 1988, memorandum to Sally Farrell which requested assistance in determining whether to regard emissions from rocket nozzles as fugitive or point sources. We have consulted with the New Source Review Section in the Air Quality Management Division, and both sections agree that emissions from rocket nozzles are point sources. Fugitive emissions are defined as "...those emissions which could not reasonably pass through a stack, chimney, vent, or other functionally equivalent opening." The nozzle of the rocket would be considered a vent or functionally equivalent opening. Therefore, emissions from rocket firing should not be considered fugitive emissions.

If you have any questions, Please contact Sally Farrell at FTS-382-2875.

cc: David Solomon John Dale